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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**NEW HOPE HOSPITALITY, LLC,
DEBTOR**

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**CASE NO: 12-31959-HDH-11
CHAPTER 11**

**DEBTOR'S APPLICATION TO
EMPLOY MANAGEMENT COMPANY**

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

COMES NOW, New Hope Hospitality, LLC, (“Debtor”), a Debtor in the above-styled and numbered case and files this its Application to Employ Management Company (the “Application”) and in support of same would respectfully show the Court as follows:

1. Debtor filed its voluntary petition under Chapter 11, title 11, of the United States Bankruptcy Code on March 30, 2012, in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division.
2. In order to facilitate the operations of the Debtor's hotel, Debtor desires to hire Dhillon Management Company, LLC (“DMC”), as management company on behalf of the Debtor in this matter.
3. Pursuant to Bankruptcy Rule 2014(a), the Affidavit of Jagmohan Dhillon is attached hereto as Exhibit "A" and attests that DMC holds no interest against the Debtor for pre-petition services, is disinterested within the meaning of 11 U.S.C. §101(14) to the best of his knowledge, information, and belief as to the estate and its creditors, save and except Jagmohan Dhillon’s 65% shares of stock owned in the Debtor and is the Managing Member of the Debtor.
4. DMC has been chosen by Debtor in that it is experienced in property management of hotels from 49 to 125 rooms. The Debtor seeks to retain DMC to represent it in this matter.
5. DMC has been paid no retainer in these proceedings.
6. DMC has agreed to represent the Debtor on the terms set forth in this Application and the Management Agreement attached hereto as Exhibit “B”.

7. Pursuant to the provisions of Bankruptcy Rule 2016(b)(1) of the Bankruptcy Code § 330, DMC requests to be paid 4% of the total net income per month for services during the pendency of this bankruptcy matter.
8. Debtor believes the employment of DMC, as management company, is in the best interest of the Debtor's bankruptcy estate. Further, the Debtor believes it is necessary to retain it immediately for the purpose of facilitating the operations of the Debtor's hotel during the proceedings.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays this Honorable Court enter an Order approving the employment of Dhillon Management Company, LLC, as management company for Debtor, on the terms and conditions contained herein, and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

/s/ Arthur I. Ungerman
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing application has been sent to the United States Trustee and the following parties on the Creditor Matrix on April 11, 2012.

/s/ Arthur I. Ungerman
Arthur I. Ungerman